

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
VICTORIA DAVIS
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of Defendants' Opposition to Plaintiffs' *Daubert* Motion to Preclude Opinions of Defense Expert Steven W. Baertschi, Ph.D.
2. Attached hereto as Exhibit A is a true and accurate copy of excerpts of the transcript of the deposition of Stephen Hecht, Ph.D., in MDL 2875, dated January 13, 2023.
3. Attached hereto as Exhibit B is a true and accurate copy of excerpts of the transcript of the deposition of Philip James Russ, in MDL 2875, dated January 5, 2023.

4. Attached hereto as Exhibit C is a true and accurate copy of the errata sheet to the transcript of the deposition of Steven W. Baertschi, Ph.D., in MDL 2875, dated March 10, 2023.

Dated: April 11, 2023

Respectfully submitted,

/s/ Victoria Davis Lockard

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Industries Ltd., Actavis Pharma, Inc.,
and Actavis LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2023, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Steven M. Harkins
Steven M. Harkins